



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Verizon Communications
DOCKET NO.: 08-04552.001-I-2
PARCEL NO.: 09-03-105-038

The parties of record before the Property Tax Appeal Board are Verizon Communications, the appellant, by attorney Dennis M. Nolan of the Law Office of Dennis M. Nolan, P.C., Bartlett, Illinois; and the DuPage County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds no change in the assessment of the property as established by the DuPage County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$221,790
IMPR.: \$542,820
TOTAL: \$764,610

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is improved with a one-story, owner occupied, single tenant, industrial building that contains 46,709 square feet of building area including 4,705 square feet of office space. The building is of masonry exterior construction with a slab foundation and was built in 1985. The building has an 18 foot interior ceiling height and has central air conditioning. The property has a 97,650 square foot site resulting in a land to building ratio of 2.09:1. The property is located in Westmont, Downers Grove Township, DuPage County.

The appellant appeared before the Property Tax Appeal Board by counsel challenging the assessment as established for the 2008 tax year on the basis of overvaluation. In support of this argument the appellant submitted a narrative appraisal prepared by Shawn Schneider and Susan Z. Ulman of Zimmerman Real Estate Group, Ltd. estimating the subject property had a market value of \$1,400,000 as of January 1, 2008, which was marked as Appellant's Exhibit No. 1.

Ms. Ulman was called as the appellant's witness. Ulman is president of Zimmerman Real Estate Group. She has the Member of the Appraisal Institute (MAI) designation, the Senior Real

Property Appraiser (SRPA) designation from the Appraisal Institute and is a State of Illinois State Certified General Real Estate Appraiser. The witness testified that Zimmerman Real Estate Group practices primarily in the Chicago Metro area appraising industrial properties, apartments, offices, retail, hotels and vacant land. She further testified she has done considerable work in DuPage County and with industrial types of buildings in DuPage County.

Ms. Ulman testified that she performed an exterior inspection of the subject property while Shawn Schneider, a vice president of Zimmerman Real Estate Group, did an interior and exterior inspection. She further testified that Schneider prepared the appraisal report and she performed the review. The witness inspected the property in June 2011.

The appraiser testified the analysis was a complete summary report containing the three approaches to value; the cost approach, the income approach and the sales comparison approach. The purpose of the appraisal was to estimate the market value of the property as if owned in the fee simple estate, free and clear of all encumbrances, special assessments and liens. (Appellant's Exhibit No. 1, page 5.) The appraisers also concluded the highest and best use of the subject property as improved is the continued use as an industrial type facility until such time that the improvements reach the end of their effective useful life. (Appellant's Exhibit No. 1, page 22.)

Under the cost approach to value the appraiser accepted the township assessor's estimated land value but rounded the value to \$665,000. In estimating the replacement cost new of the improvements the appraiser used the *Marshall & Swift Valuation Service*. The appraiser estimated the subject property had a base cost of \$39.00 per square foot plus \$1.50 per square foot allowance for the sprinkler system. The appraiser made adjustments to the base cost for height and size refinements, a current cost multiplier and a local multiplier to arrive at a square foot cost of \$47.76 resulting in a replacement cost new of \$2,230,822. To this the appraiser added \$25,000 for the value of the site improvements to arrive at a replacement cost new of \$2,255,822. The appraiser then added 8% of the indicated replacement cost for entrepreneurial profit, real estate taxes and other soft costs to arrive at a total replacement cost new of \$2,436,288. The appraiser estimated the subject property suffered from 65% physical deterioration. The appellant's appraiser was of the opinion the subject did not suffer from significant functional and economic obsolescence. Deducting \$852,701 in depreciation and adding \$665,000 for the land value resulted in an estimated value under the cost approach of \$1,520,000, rounded.

The next approach to value developed by the appraiser was the income approach to value. The first step under the income approach was to estimate the market rent for the subject property. The appraisal had four rental comparables improved

with industrial buildings that ranged in size from 56,046 to 288,366 square feet of building area. Comparables #1 through #3 were multi-tenant buildings. The building areas within the rental comparables that were leased ranged in size from 36,891 to 69,725 square feet with rents ranging from \$4.50 to \$5.25 per square foot on a net basis. The appraisal also had information from CB Richard Ellis for the 4th Quarter of 2007 listing the average asking lease rates. Based on this information the appraiser estimated the subject had a market rent of \$5.00 per square foot on a net basis or \$233,545.

The next step in the income approach was to estimate the vacancy and collection loss. The report indicated that the Industrial Market Index 4th Quarter 2007 published by CB Richard Ellis indicated the overall Chicago area industrial market had an 8.6% vacancy and the West Suburbs industrial market had a 6.6% vacancy. The appraiser used a 10% allowance for vacancy and collection loss resulting in an effective gross income of \$210,191.

The appraisal indicated that since the income was estimated on a net basis the expenses incurred by the lessor would include a nominal management fee, leasing expenses and reserves for replacement. The appraiser estimated the subject would have \$76,883 for management and leasing, insurance, operating expenses and reserves resulting in a net operating income of \$133,307.

The final step was to estimate the capitalization rate to be applied to the net operating income. Using the band of investment technique the appraiser estimated the subject property would have an overall rate of 9.5%. The appraiser also used a modified tax load factor of .01616% to reflect the real estate tax expense due to vacancy. Adding the components resulted in a loaded capitalization rate of 9.66%. Capitalizing the net income of \$133,307 by 9.66% resulted in an estimated value under the income approach of \$1,380,000 rounded. The appraiser testified the subject property is owner occupied and utilized by Verizon. She also agreed that the subject has approximately 10% of the building area devoted to office space.

The final approach developed by the appraiser was the sales comparison approach to value in which five comparable sales were used. The comparables were improved with buildings that ranged in size from 29,450 to 67,451 square feet of building area and were constructed from 1960 to 1996. The comparables were described as being three manufacturing buildings and two warehouse buildings. These comparables had sites that ranged in size from 72,310 to 219,107 square feet of land area resulting in land to building ratios ranging from 2.26:1 to 4.12:1. The comparables were located in Downers Grove, Bloomingdale, Glendale Heights and Naperville. The sales occurred from October 2006 to July 2008 for prices ranging from \$875,000 to \$2,243,000 or from \$13.54 to \$36.78 per square foot of building area, including land. Adjustments to the comparables were made for such items as market condition changes, location, building age, building size

and land-to-building ratio. Based on these sales the appellant's appraiser estimated the subject property would have a market value of \$30.00 square foot of building area or \$1,400,000, including land, rounded.

In reconciling the three approaches to value, the appellant's appraiser gave most weight to the sales comparison approach to value and estimated the subject property had a market value of \$1,400,000 as of January 1, 2008. The witness stated most weight was given to the sales comparison approach because properties of this type are most frequently bought for use by an owner occupant. Ulman testified the income approach was the second most reliable approach in her analysis.

The appellant requested the subject's assessment be reduced to reflect the appraised value.

Under cross-examination the witness explained that CAM, as a deduction in the income approach, typically has the definition of common area maintenance, however, in this case it is for general overall maintenance. She explained CAM is current operating expenses such as upkeep, repair and maintenance. The witness further explained that CAM is only during the 10 percent period they projected the subject to be vacant.

The witness was of the opinion that higher ceiling heights would command a higher rent than a lower ceiling height when considered significantly different and helpful to the operation of the property. She also agreed that office percentage is import consideration to a tenant. The witness did not know the ceiling height or the percent of office space for rental comparable #1. Only the clear ceiling height for rental comparable #3 was disclosed, which ranged from 14 to 30 feet. The appraiser testified the subject has a clear ceiling height of 18 feet. The appraiser testified that in the income approach they did not present any adjustments for ceiling height or office space differences.

Within the sales comparison approach the appraiser did not indicate ceiling heights or office percentages associated with the comparables. She testified that she did not include those elements in the descriptions of the comparables because there is a lot of similarity in terms of properties of similar vintage having similar features. The witness indicated comparable #1 was constructed in 1960 and was similar enough to be considered. Ulman indicated they retained a service called CoStar to verify the sale price of comparable #1. The appraisal reported a sales price for comparable sale #1 of \$1,550,000 while the PTAX-203 Illinois Real Estate Transfer Declaration (hereinafter "PTAX-203", or "Illinois Real Estate Transfer Declaration" or "transfer declaration") for the sale, which was submitted by the board of review, disclosed a price of \$1,500,000. The appraiser further testified the second sale of comparable number #1 that occurred in December 2007 for a price of \$2,750,000 was not available when they were doing their analysis. The board of review submitted a

copy of the Illinois Real Estate Transfer Declaration associated with second sale of comparable #1 that occurred in December 2007. The transfer declaration associated with the December 2007 sale indicated the property was advertised for and that major remodeling occurred in March 2007. The PTAX-203-A Illinois Real Estate Transfer Declaration Supplemental Form A (hereinafter "PTAX-203-A" or "Illinois Real Estate Transfer Declaration Supplemental Form A") for this sale indicated the property was on the market 7 months and the improvement was not occupied when it sold. Ulman testified the buyer later demolished the improvements on this property and the property, as vacant land, is currently listed for \$2,750,000.

Ulman was also questioned about whether or not the Illinois Real Estate Transfer Declaration for sale #3 was checked because it reflects a sale of 50% interest. The board of review submitted a copy of the Illinois Real Estate Transfer Declaration associated with comparable #3 that reflected there was a transfer of less than 100% of the property and further indicated a sale of 50% interest to other owner for a price of \$987,500. Ulman did not know this was a sale of a partial interest when the report was written. She further indicated the sale price would not be a reliable indicator for 100% of the property.

With respect to sale #4, Ulman testified she had the deed but did not recall if she looked at the Illinois Real Estate Transfer Declaration associated with this sale. According to the witness, the deed, based on the revenue stamps, showed a consideration of \$2,243,000 was paid for the property. The witness stated she looked at the transfer declaration in preparation for the hearing but not in the preparation of the appraisal. The witness testified this was a sale of less than a 100 percent interest in the property, 86.4%, and would not be a reliable indicator of 100% interest in the property.

With respect to sale #5 the witness indicated that she looked at the sales declaration for this property in preparation for the hearing but relied on CoStar research in the preparation of the appraisal. The transfer declaration for this property, which was submitted by the board of review, indicated a sales price of \$1,750,000 and that the transfer was less than 100% interest in the property.

Ulman testified page 3 of the appraisal was in error wherein it was stated "The subject property is encumbered by short-term leases." The report was also in error on page 3 in describing the subject property is an income producing residential type property because the subject property is an industrial property and is producing no income. The report was also in error on page 3 in stating that the income approach was given the most weight in the analysis. The appraiser also agreed the appraisal was in error on page 6 in stating the subject property is located in Chicago, Illinois.

Under redirect examination the appraiser testified that the PTAX-203 Illinois Real Estate Transfer Declaration for the December 2007 sale of comparable #1 indicated the property was purchased by MacNeil Real Estate located on Wisconsin Avenue approximately one block from the comparable. The appraiser stated she would not have used the December 2007 sale of the comparable for a price of \$2,750,000. She opined the purchaser paid a premium to because the property was located nearby. Ulman was of the opinion the sale was not a good indicator of market value, rather the transaction was an indicator of what a neighbor would pay for the property.

With respect to comparable sale #4, the appellant's appraiser stated the Illinois Real Estate Transfer Declaration disclosed this was a sale between related individuals or corporate affiliates. Additionally, the witness testified that the PTAX-203-A Illinois Real Estate Transfer Declaration Supplemental Form A, question 3, indicated that the number of months this property was listed on the market as "none."

The board of review submitted its "Board of Review Notes on Appeal" wherein its final assessment of the subject totaling \$764,610 was disclosed. The subject's assessment reflects a market value of \$2,298,197 or \$49.20 per square foot of building area, land included, when using the 2008 three year average median level of assessments for DuPage County of 33.27%.

In support of its contention of the correct assessment of the subject property the board of review called as its witness Edward Rottmann, head of the commercial/industrial department in the Downers Grove Township Assessor's Office. Rottmann has the Independent Fee Appraiser Senior (IFAS) designation and is a state certified general appraiser and a certified appraiser reviewer. The witness also has the Certified Illinois Assessing Officer (CIAO) designation. Rottmann prepared a report that was submitted by the board of review in support its contention of the correct assessment.

Rottmann testified he utilized CoStar Comps to identify comparable sales. He ultimately selected four sales located in Downers Grove Township and one sale in York Township, approximately two blocks outside Downers Grove Township. The board of review submitted copies of the property record cards or printouts from the assessor's website, the Illinois Real Estate Transfer Declarations, and the Illinois Real Estate Transfer Declaration Supplemental Form A for the five comparables he selected.

The comparables were improved with industrial buildings that ranged in size from 25,000 to 52,695 square feet of building area and were constructed from 1973 to 1999. The assessor indicated four of the comparables were one-story buildings that had ceiling heights that ranged from 15 to 27 feet and offices that ranged in size from 8% to 28% of building area. The comparable properties had sites that ranged in size from 66,837 to 158,994 square feet

resulting in land to building ratios ranging from 2.00:1 to 4.16:1. The sales occurred from September 2006 to May 2008 for prices ranging from \$1,500,000 to \$3,884,174 or from \$52.89 to \$114.00 per square foot of building area, including land. The record indicated that comparable sale #1 sold in October 2006 for a price of \$3,150,000 and again in July 2008 for a price \$3,884,774. The PTAX-203's indicated that comparable sales #1, #3 and #5 were advertised and the PTAX-203-A's indicated comparable sales #1, #4 and #5 were advertised on the market from 2 to 8 months.

Rottmann testified that when dealing with industrial warehouse buildings ceiling height and office space are very normal measures of comparison. Rottmann testified comparable #2, which sold for \$114.00 per square foot of building area, was much more superior than the subject property. He explained these fives were included in the analysis because he was showing the market in Downers Grove Township.

Rottmann also testified that he found 21 sales in DuPage County using CoStar Comps and the same parameters as contained in the appellant's appraisal of 29,450 to 67,451 square feet of building area constructed between 1960 and 1996. After eliminating the sales that were not arm's length and three included in the appellant's appraisal, 14 sales remained. The 14 sales were improved with industrial buildings that ranged in size from 29,808 to 78,420 square feet and were built from 1965 to 1996 with one being renovated in 2007. Nine of these were reported to have office space ranging from 4% to 35% of building area and ceiling heights ranging from 20 feet to 28 feet. These properties had land to building ratios ranging from 1.08:1 to 4.66:1. The sales occurred from November 2006 to July 2008 for prices ranging from \$1,476,398 to \$5,950,000 or from \$49.53 to \$105.23 per square foot of building area, including land.¹

Rottmann testified all of his sales were 100 percent interest conveyed and verified as arm's length transactions through the sales declarations and the assessor's cards.

The witness further testified that after looking over everything, his conclusion was that at \$49.00 per square foot of building area the subject property is probably low as far as being assessed. He did not think a value of \$30.00 per square foot of building area for the subject property would be an appropriate value.

Based on this evidence the board of review requested at the hearing that the assessment of the subject property be increased to \$996,666 or to reflect a market value of approximately \$2,990,000 or \$64.00 per square foot of building area, including land.

¹ The median sales price for these comparables was \$65.00 per square foot of building area, including land, and the mean sales price for the comparables was \$67.71 per square foot of building area, including land.

Under cross-examination Rottmann testified he has a separate appraisal business, Realtec Corporation. He also testified that he is the commercial/industrial consultant with Downers Grove Township and through that position he was given control over the commercial/industrial department. The witness clarified that he is not an employee of Downers Grove Township.

Rottmann testified that through Realtec Corporation most of his appraisals are for ad valorem purposes. However, he is also the senior appraiser for Arthur Sheridan & Associates where he does other types of appraisals. Rottmann does appraisals for taxpayers to challenge their assessments and practices in DuPage County. The witness testified that he was retained to consult with Downers Grove Township 12 or 13 years ago and has appeared once before the DuPage County Board of Review relative to an ad valorem tax appeal appraisal during that period of time. The witness testified he doesn't do any work in Downers Grove Township and was of the opinion there was no conflict of interest.

Board member Carl Peterson testified that Rottmann has not appeared before him at the DuPage County Board of Review and he does all of the commercial/industrial appeals.

With respect to the documentation prepared by Rottmann, he testified it is not an appraisal and he did not provide an opinion of value. He stated that even though in the last sentence of the narrative he prepared he requested the Property Tax Appeal Board increase the assessment, he did not offer an opinion of value.

Rottmann further agreed that he had not adjusted the sales he submitted and there was no analysis as far as location, building height and ceiling height. The witness testified his sale #1 had more office space and the warehouse portion has more ceiling height than the subject property. Sale #1 also had more land area than the subject property with 353,053 square feet. Rottmann was of the opinion that buildings with more ceiling height would sell for more on the open market, if all else is equal, and property with more land area would sell for more on a square foot basis. Rottmann did not know whether sale #1 was an owner-occupied property or multi-tenant.

Rottmann agreed sale #2 was constructed in 1999 and has 25,000 square feet, making it newer and smaller than the subject property. He also agreed that smaller buildings sell more per square foot, if all else is equal.

With respect to sale #3, the building has slightly higher ceiling heights of 20 to 22 feet. Rottmann testified the transfer declaration for comparable #3 stated the property was on the market for sale zero months. The witness did not know whether a tenant was in the building that purchased the property.

Rottmann also agreed that comparable #4 was a smaller building than the subject building. The ceiling height on the comparable is 16 and 22 feet compared to the subject's 20 feet. Rottmann had no knowledge whether or not this was a USDA facility.

Rottmann was also question about whether or not sale #5 was part of a 1033 exchange. He also did not know whether comparable #5 was a multi-tenant building. Rottmann also agreed that he did not adjust the data for the other 14 sales he submitted.

After hearing the testimony and considering the evidence the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal. The Board further finds the evidence in the record does not support a change in the subject's assessment.

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. Except in counties with more than 200,000 inhabitants that classify property, property is to be valued at ~~33~~ of fair cash value. (35 ILCS 200/9-145(a)). Fair cash value is defined in the Property Tax Code as "[t]he amount for which a property can be sold in the due course of business and trade, not under duress, between a willing buyer and a willing seller." (35 ILCS 200/1-50). The Supreme Court of Illinois has construed "fair cash value" to mean what the property would bring at a voluntary sale where the owner is ready, willing, and able to sell but not compelled to do so, and the buyer is ready, willing, and able to buy but not forced to do so to do. Springfield Marine Bank v. Property Tax Appeal Board, 44 Ill.2d 428 (1970). When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. (86 Ill.Admin.Code §1910.65(c)). The Board finds the evidence in the record demonstrates a change in the subject's assessment is not justified.

In support of the overvaluation argument the appellant submitted an appraisal of the subject property prepared by Shawn Schneider and Susan Z. Ulman of Zimmerman Real Estate Group, Ltd. estimating the subject property had a market value of \$1,400,000 or approximately \$30.00 per square foot of building area, land included, as of January 1, 2008. The Board find the conclusion of value contained in the appraisal and testified to by Ms. Ulman is not credible.

The appellant's witness testified and the appraisal itself stated that the sales comparison approach was given the most emphasis in arriving at the estimate of value of \$1,400,000 or approximately \$30.00 per square foot of building area, rounded. The Board agrees that the sales comparison approach should be given the most emphasis under the facts of this appeal; however, the Board

finds the appellant's appraisers did not adequately analyze the sales within the report and the sales were not good indicators of fair cash value, which undermines ultimate the conclusion of value proffered by the appraisers. The evidence disclosed that comparable sale #1 in the appraisal sold twice, first in March 2007 for a price of \$1,500,000 or \$28.20 per square foot of building area, including land (based on the Illinois Real Estate Transfer Declaration) and again in December 2007, within one month of the assessment date at issue, for a price of \$2,750,000 or \$51.71 per square foot of building area, including land. Of these two transactions, the Board finds the most probative sale would have occurred most proximate in time to the assessment data. Although Ulman testified she would not have used the second sale, this was based on assumptions. (Transcript page 67.) A copy of the Illinois Real Estate Transfer Declaration and the copy of the Illinois Real Estate Transfer Declaration Supplemental Form A associated with the December 2007 sale disclosed the property was advertised for sale and was on the market for 7 months. Furthermore, there was no showing that the parties to the transaction were related individuals or corporate affiliates. Using the first and lower sales price of this comparable would appear to result in understating the market value of the subject property.

Sale #2 used by the appraisers was significantly older than the subject property being originally constructed in 1961 or 1962. The report indicated this building was renovated in 2007; however, that was after the October 2006 purchase.

Appraisal sale #3 was disclosed to be a sale of a partial interest (50%) for a price of \$987,500. Ulman testified that would not be a reliable indicator for a 100% of the property. If the price is reflective of the market value of a $\frac{1}{2}$ interest in the real estate, the full value for this comparable would appear to be \$1,975,000 or \$67.06 per square foot of building area, including land. This is significantly above the appraisers' estimated value of \$30.00 per square foot of building area and above the market value reflected by the subject's assessment.

With respect to appraisal comparable sale #4, the Illinois Real Estate Transfer Declaration indicated a net consideration for the real estate of \$3,802,742 not the \$2,243,000 as reported in the appraisal. (The record actually contains copies of two Illinois Real Estate Transfer Declarations associated with this sale for a combined net consideration of \$4,400,001. Using this total consideration for this comparable would reflect a \$72.15 per square foot of building area, including land.) Furthermore, the transfer Illinois Real Estate Transfer Declaration indicates this was a sale between related individuals or corporations and there was a transfer of less than 100% interest. The Board finds this sale as reported in the appraisal may not be truly indicative of the purchase price and market value and should be discounted.

The record further disclosed through Illinois Real Estate Transfer Declaration that appraisal sale #5 was a sale of less

than 100% interest in the property. As noted, Ulman had testified that a sale of a partial interest would not be a reliable indicator for a 100% of the property. The Board finds this sale as reported in the appraisal may not be truly indicative of market value and should be discounted.

Based on this analysis, the Board finds the sales comparison approach contained in the appellant's appraisal is not a reliable or credible estimate of market value and should be given little weight. Due to the fact that the appraisers gave most emphasis to this approach in arriving at their conclusion of market value, the Board finds their conclusion of value is not reliable or credible.

The Board finds the board of review, through Rottmann, presented information on 19 sales that demonstrated the subject property was not overvalued. Five sales, located in Downers Grove Township and York Township, sold from September 2006 to May 2008 for prices ranging from \$1,500,000 to \$3,884,174 or from \$52.89 to \$114.00 per square foot of building area, including land. Additionally, Rottmann identified 14 other sales in DuPage County that sold from November 2006 to July 2008 for prices ranging from \$1,476,398 to \$5,950,000 or from \$49.53 to \$105.23 per square foot of building area, including land. The subject's assessment reflects a market value of \$2,298,197 or \$49.20 per square foot of building area, land included, when using the 2008 three year average median level of assessments for DuPage County of 33.27%. The subject property has a unit value below the range established by these raw sales prices. Additionally, these sales have prices significantly above the appellant's appraisers' estimated value of \$30.00 per square foot of building area, including land, which further demonstrates the appraisers' opinion of value was not credible.

Based on this record, the Board finds no change in the assessment of the subject property is warranted.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code.

Donald R. Cuit

Chairman

K. L. Fern

Member

Frank A. Huff

Member

Mario Morris

Member

J. R.

Member

DISSENTING: _____

C E R T I F I C A T I O N

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: June 22, 2012

Allen Castrovillari

Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing

complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for the subsequent year directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.